Tandridge District Council Local Plan Examination
Matter 2: The Provision of Housing

On behalf of Countryside Properties

September 2019 – DHA/11859
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1 Introduction

1.1 Purpose of this Statement

1.1.1 These comments are prepared on behalf of Countryside Properties Ltd (‘Countryside’) in respect of the Tandridge District Council Local Plan Examination. They respond to the initial Matters, Issues and Questions (MIQ’s) set by the inspector on 4th July 2019. Specifically, they respond to Matter 2 (‘The Provision of Housing’).

1.1.2 Countryside are promoting Land south of Smallfield (site reference: SMA21). Nonetheless, the comments contained herewith relate only to the initial questions raised by the inspector.

1.1.3 In formulating these additional comments, we acknowledge that the Government published the revised National Planning Policy Framework in February (NPPF) 2019. However, as the Council chose to submit its plan before 24th January 2019, the policies in the original 2012 framework apply to this Examination. On this basis, any reference to the NPPF relates to the 2012 publication and to be sound it must be:

- Positively prepared – the plan should seek to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;

- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;

- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and

- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

1.1.4 In formulating this response, we have addressed the Inspector’s questions directly and recapped our Regulation 19 concerns.
**2 Matter 2: The Provision of Housing**

**2.1 Issue:** Is the plan positively prepared and justified given that the Plan provides for 6,056 homes in the Plan period, against the OAN of 9,400 as set out in the Publication Plan and the OAN of 7,960 set out in the document Updating the Objectively Assessed Housing Needs of Tandridge (HNS5)?

*Is the Plan justified in not meeting the full OAN for Tandridge and is it consistent with paragraph 14 of the Framework? (Q 2.7)*

*Have all realistic options for meeting the OAN within Tandridge in full been exhausted? (Q 2.8)*

**2.1.1 No.** The plan fails to meet the full objectively assessed housing needs. Furthermore, the Council has not provided adequate evidence that the adverse impacts of doing so would significantly and demonstrably outweigh the benefits or that specific policies in the framework indicate that development should be restricted (NPPF Paragraph 14).

To under provide housing by up to 3,276 dwellings is not justified when there is scope to allocate additional land for housing in areas that have already been accepted as sustainable locations.

**2.1.2 The urban sites in the District have largely been depleted, so we endorse the release of Green Belt sites. Nevertheless, this has not gone far enough and it is our view that an increased level of land could be released from the Green Belt - around tier 1 and tier 2 settlements - without having any greater adverse impact on the spatial strategy.**

**2.1.3 In addition, the proposed alterations to the Green Belt boundaries, and rejection of others, are not justified nor underpinned by a robust site selection methodology. Please refer to Countryside’s matter 4 response for a detailed response to question 4.4.**

**2.1.4 For these reasons, the plan is not the most “most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence” (NPPF Paragraph 182) as an alternative strategy could release additional sites from the Green Belt to meet OAN and still be consistent with the NPPF.**

**2.1.5 Turning to whether the plan is consistent with paragraph 14 of the framework, our view is that it cannot be if it does not meet objectively assessed needs. The social and economic benefits associated with providing new housing would be significant – particularly given the acuteness of the District’s housing need. Accordingly, for a local planning authority to not meet their OAN there would need to be adverse impacts that significantly and demonstrably outweigh these benefits cumulatively.**

**2.1.6 We acknowledge that 94% of the District is Green Belt and providing housing to meet full OAN would require further amendments to the Green Belt boundary. Nonetheless, it has already been accepted that exceptional circumstances exist, which are fully evidenced and justified.**

**2.1.7 The Council have already proposed a number of amendments to the Green Belt boundary - including the release of land to deliver a garden community – however**
further amendments could be made that would equally be fully evidenced and justified. The failure to endorse this approach means that the Council have failed to positively seek opportunities to meet development needs of their area.

2.1.8 For these reasons, the plan is not justified in not meeting its OAN and is inconsistent with paragraph 14 of the NPPF. Further, Tandridge have failed to exhaust all reasonable options to meet their full OAN, as they have unfairly ruled out Green Belt land around tier 1 and tier 2 settlements.

2.2 Issue: Is the proposed supply of housing for the plan period realistic?

Does the Housing Trajectory set out in the Housing Topic Paper (HNS2) provide a sound basis for meeting identified housing need?

Is the housing trajectory realistic and deliverable in terms of its components and are there any threats to delivery?

2.2.1 The Housing Trajectory Topic Paper (HNS2) summarises the Councils land supply position to 2033, having regard to the Local Plan evidence base. It predicts that 6,057 new homes will be delivered, which is just 67 homes less than their housing target. It takes into account the delivery of completed and extant permissions, allocated sites, windfall development and town centre initiatives (Appendix 3).

2.2.2 The trajectory considers all of the supply components, however it makes a number of assumptions about delivery that are not backed up by substantiated evidence. This is particularly true of the South Godstone Garden Community, as the Council anticipate that 1,400 new homes will be delivered from 2026 onwards at a consistent build out rate of 200 dwellings per annum.

2.2.3 It is not impossible that 200 homes per annum could be delivered on a site of this nature, however there is a lack of robust evidence pertaining to development being delivered by 2026 or the necessary infrastructure being in place thereafter to ensure a consistent rate of delivery.

2.2.4 The 2026 housing date is based on the upfront delivery of infrastructure needed to support an increased population and the time needed to produce an AAP and masterplan. The trajectory was informed by the Nathaniel Lichfield’s and Partners ‘Start to Finish – How Quickly do Large-Scale Housing Sites Deliver’ 2016 document, which identified that it takes circa 3.5 years to gain planning permission and 5.9 years for development to start on site (para. 379).

2.2.5 The South Godstone Garden Community comprises 23% of the Council’s housing need target, so they are heavily reliant on it as a source of supply within the upcoming plan period. However, having regard to the level of infrastructure that is needed (see ref para. x), the need for an AAP to be prepared and the time needed for a planning application to be considered and determined, the concept is really a strategic plan for the next plan period.

2.2.6 In terms of whether the housing trajectory is realistic and deliverable, our concerns in respect of the South Godstone Garden Community have already been vocalised. Further, the threats to its delivery within the plan period are significant, these being; the delivery of infrastructure; land assembly; the master planning process; the planning application process; and the construction process. The Councils trajectory timetable takes an overly optimistic view on how quickly these elements...
2.2.7 Looking more widely, we generally accept the ‘expected delivery timetable’ for allocated sites (Appendix 2), which has been drafted to align with specific housing allocation policies. Nonetheless, the trajectory assumes that all of the extant planning permissions will be delivered between the monitoring years 2018/19 and 2020/21.

- 2018/19 – 376 dwellings
- 2019/20 – 384 dwellings
- 2020/21 – 294 dwellings

2.2.8 We do not consider this to be realistic, given that on average just 237 dwellings per year have been delivered since 2010 (HNS8 Table 6). Accordingly, the sources of supply are not supported by evidence.

2.2.9 In addition, whilst we accept that 348 dwellings on windfall sites have been completed since 2006 (HNS2 Table 7) - at an annual average of 29 units - the Local Plan evidence identifies a scarcity of suitable brownfield sites. Indeed, as the Council have opted to review their boundaries the strategy should have already made as much use as possible of suitable brownfield and underutilised land. Therefore, it is unrealistic to rely on a consistent rate of windfall development when there are limited sites that could come forward.

2.2.10 We duly acknowledge the findings from the Tandridge Urban Capacity Study (SBC2), which identifies 16 brownfield sites across the top 3 tiers of settlements. However, only 9 of these are within identified settlement boundaries (not washed over by Green Belt) and just 3 sites are allocated in the Local Plan. Further, optimised densities would need to be achieved to deliver 300 dwellings, which would still fall 135 dwellings shy of the Council’s assumed target. Moreover, there is no certainty that these sites will come forward. Indeed, if there was a desire for these sites to be redeveloped within the plan period they should have been allocated and assessed as part of the Local Plan review process.

2.2.11 Taking the above into account, the Housing Trajectory does not provide a sound basis for meeting identified housing need as it relies on sources of supply being delivered based on unrealistic assumptions.